

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

COMMISSIONERS OF PUBLIC WORKS)	C/A No. 2:21-cv-00042-RMG
OF THE CITY OF CHARLESTON (d.b.a.)	
Charleston Water System), Individually and)	
on Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	MOTION TO DISMISS PLAINTIFF'S
)	COMPLAINT AGAINST DEFENDANTS
Versus)	COSTCO WHOLESALE CORPORATION,
)	CVS HEALTH CORPORATION, AND
COSTCO WHOLESALE CORPORATION,)	TARGET CORPORATION
CVS HEALTH CORPORATION,)	
KIMBERLY-CLARK CORPORATION,)	
THE PROCTER & GAMBLE COMPANY,)	
TARGET CORPORATION,)	
WALGREENS BOOTS ALLIANCE, INC.)	
and WAL-MART, INC.,)	
)	
Defendants.)	

The Defendants Costco Wholesale Corporation, CVS Health Corporation, and Target Corporation move the Court for an Order dismissing Plaintiff's Complaint in compliance with the doctrine of primary jurisdiction. The grounds for this Motion are set forth in the accompanying Memorandum in Support of Defendant's Motion to Dismiss Plaintiff's Complaint Against Defendants Costco Wholesale Corporation, CVS Health Corporation, and Target Corporation.

Respectfully submitted this 12th day of April 2021.

s/ Molly H. Craig

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Corporation, CVS Health Corporation, and Target
Corporation*